

REMARKS

After entry of this amendment, claims 3-38 remain pending. In the present Office Action, claims 3-38 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Yu, U.S. Patent No. 5,734,865 ("Yu"). Applicants respectfully traverse this rejection and request reconsideration.

The present Office Action maintains the rejection over Yu from the first Office Action, mailed May 23, 2005. Applicants respectfully submit that the remarks from the Response filed June 9, 2005 (the "previous response") illustrate why claims 3-38 are patentable over Yu, and incorporate those remarks by reference herein. Applicants provide additional remarks and respond to the present Office Action's assertions with regard to the remarks from the previous response below.

Applicants respectfully submit that each of claims 3-38 recite combinations of features not taught or suggested in Yu. Some such features are highlighted in the remarks from the previous response. Additionally, each of claims 3, 15, and 27 recites a combination of features including: "assigning a first IP address of the plurality of IP addresses to a first application; assigning a second IP address of the plurality of IP addresses to a second application; and if the first application is to be isolated from the second application, including the first IP address in a first virtual network environment and including the second IP address in a second virtual network environment different from the first virtual network environment, wherein the first virtual network environment is transparent to the first application, and wherein the second virtual network environment is transparent to the second application". Support for this amendment may be found throughout the specification (see, e.g., page 4, lines 13-14).

The rejection based on Yu asserts that the first and second applications are taught by Yu's network interfaces. However, Yu's virtual LANs are not transparent to Yu's network interfaces. Rather, Yu's network interfaces are part of the virtual LANs (e.g., see Fig. 2 of Yu, where the virtual network interface 100-2 is part of the virtual LAN 100).

Thus, Yu's virtual network interface 100-2 is fully aware of the virtual LAN and is part of implementing the virtual LAN functionality. See also Yu, col. 10, lines 28-45.

Furthermore, with regard to Applicant's traversal and argument regarding the allegedly well-known statement in the first Office Action, the present Office Action states the using IP addresses for isolation is well known, and also points out that the claims state that virtual network environments perform the isolation. Applicants hereby clarify the previous remarks.

Applicants were traversing the allegedly well-known statement with regard to claim 3 from the first Office Action. The first Office Action stated "It is well known in the communication arts that if two IP addresses are to be isolated, they should be assigned to different network environments so that the two applications associated with the IP addresses are separated" (first Office Action, page 4, lines 7-9). Applicants respectfully disagree, and traverse the allegedly well known statement (as traversed in the previous response). Applicants traverse the allegation that using different network environments for isolation is well known, and request evidence to support the allegation. Accordingly, Yu does not teach or suggest "if the first application is to be isolated from the second application, including the first IP address in a first virtual network environment and including the second IP address in a second virtual network environment different from the first virtual network environment" as recited in claims 3, 15, and 27.

For at least the above stated reasons, Applicants submit that each of claims 3, 15, and 27 are patentable over the cited art. Claims 4-14, being dependent from claim 3, are similarly patentable over the cited art for at least the above stated reasons as well. Claims 16-26, being dependent from claim 15, are similarly patentable over the cited art for at least the above stated reasons as well. Claims 28-38, being dependent from claim 27, are similarly patentable over the cited art for at least the above stated reasons as well. Each of claims 4-14, 16-26, and 28-38 recites additional combinations of features not taught or suggested in the cited art. Applicants note that additional remarks were presented in the

previous response were not addressed in the present Office Action. Applicants reiterate such remarks below for the Examiner's convenience

Applicants disagree with the allegation that the features of claim 4 would be obvious, as the allegation relies on the same allegedly well-known features and teachings of Yu used for claim 3. Thus, the rejection of claim 4 fails as well.

Applicants respectfully traverse that "It is well known that whether an IP address is virtual or physical is dependent on the environment the IP address is in" (first Office Action, page 4, lines 13-14) and request evidence of the allegation. Furthermore, even if the well known statement is true, no motivation to combine the allegedly well known teachings has been shown and Applicants submit that such teachings, in combination with Yu's teachings still would not teach or suggest the combinations of features recited in claims 5, 6, and 8.

With regard to claim 7, the first Office Action stated that it "merely sets forth the definition of the global address space". Irrespective of the correctness of this statement, the first Office Action did not illustrate why the features recited in claim 7 are allegedly taught in the cited art. Accordingly, the rejection fails to provide a *prima facie* case of obviousness of claim 7.

With respect to claims 9 and 10, the first Office Action used the contents of other claims to allege obviousness. It is improper to use the other claims to find a claim obvious, as such other claims are not prior art. Accordingly, the rejection fails to provide a *prima facie* case of obviousness of claims 9 and 10.

With regard to claim 11, the first Office Action stated that it "merely defined what the netmask and subnet are with respect to an application." Irrespective of the correctness of this statement, the first Office Action did not illustrate why the features recited in claim 11 are allegedly taught in the cited art. Accordingly, the rejection fails to provide a *prima facie* case of obviousness of claim 11.

With respect to claims 12-14, the first Office Action stated that "it is obvious that whether or not the applications are able to communicate with each other is dependent on the capability of their IP addresses". Applicants respectfully traverse. The first Office Action did not cite art that illustrates IP addresses having different "capabilities". Accordingly, the rejection fails to provide a *prima facie* case of obviousness of claims 12-14.

CONCLUSION

Applicants submit the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5760-22802/LJM.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Request for Approval of Drawing Changes
- ☐ Notice of Change of Address
- ☐ Fee Authorization Form authorizing a deposit account debit in the amount of \$
for fees ().
- ☐ Other:

Respectfully submitted,



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